

# **EXHIBIT 2**

Page 1

1           IN THE UNITED STATES DISTRICT COURT  
2           WESTERN DISTRICT OF VIRGINIA  
3           CHARLOTTESVILLE DIVISION

4           ELIZABETH SINES, SETH                         )  
5           WISPELWEY, MARISSA BLAIR,                     )  
6           TYLER MAGILL, APRIL MUNIZ,                  )  
7           HANNAH PEARCE, MARCUS                         )  
8           MARTIN, NATALIE ROMERO,                      )  
9           CHELSEA ALVARADO, and JOHN                  )  
10          DOE,   )  
11   )  
12          Plaintiffs,   ) Case No.  
13   ) 3:17-cv-00072-NKM  
14          vs.   )  
15          )  
16          JASON KESSLER, et al.,                         )  
17   )  
18          Defendants.   )

19   VIDEOTAPED DEPOSITION OF DILLON HOPPER

20   Louisville, Kentucky

21   Tuesday, August 13, 2019

22   Reported by:

23   RACHEL F. GARD, CSR, RPR, CLR, CRR

24   JOB NO. 165620

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1 D. HOPPER  
2  
3

4 August 13, 2019  
5 9:22 a.m.  
6

7 Videotaped deposition of DILLON HOPPER, at  
8 the offices of Gene Snyder Federal Building,  
9 601 West Broadway, Louisville, Kentucky,  
10 pursuant to notice before Rachel F. Gard,  
11 Certified Shorthand Reporter, Registered  
12 Professional Reporter, Certified LiveNote  
13 Reporter, Certified Realtime Reporter.

14  
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25

1 D. HOPPER

2 July 3rd, 2019, of the United States District  
3 Court in the Western District of Virginia.

4 I'm going to show you, Mr. Hopper,  
5 this Exhibit 1, as I just said, is an order  
6 dated July 3, 2019, from the Honorable Joel  
7 Hoppe. And at Page 3 of the order, it directs  
8 that you will sit for a deposition by  
9 plaintiffs' counsel devoted exclusively to both  
10 his and Vanguard America's conduct in pretrial  
11 discovery including their efforts to preserve  
12 any documents, information, or materials that  
13 are potentially relevant to this litigation?

14 Do you see that?

15 A. Yes.

16 Q. And do you understand that's why  
17 you're here today?

18 A. Yes.

19 Q. Okay. Have you read this order  
20 before?

21 A. I believe so. I might have briefly  
22 skimmed through it, but I should probably read  
23 it again.

24 Q. There will come a time when I may  
25 ask you to do that.

1 D. HOPPER

2 A. Me personally, no. But --

3 Q. You also --

4 A. -- but --

5 Q. -- testified -- you also testified  
6 earlier that people could become associated  
7 with Vanguard America and local districts  
8 without going through any vetting; isn't that  
9 your testimony earlier today?

10 A. Well, I guess it all depends on what  
11 the definition of associated with meant. I  
12 mean, if there was an individual who wanted to  
13 join Vanguard, I mean, I suppose that could be  
14 considered an associate. But to my knowledge,  
15 James Fields never attempted to contact.

16 Q. But you don't have any knowledge one  
17 way or the other about that; isn't that right?

18 A. No, not particularly. I mean, that  
19 would have to go through Mr. Rousseau because  
20 he was the one in charge of the vetting servers  
21 and the vetters and all of that.

22 Q. But you've testified earlier today  
23 that Mr. Rousseau was unwilling to talk to you  
24 about any of the allegations in the complaint  
25 and that you didn't speak with him in

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1 D. HOPPER

2 C E R T I F I C A T E

3 STATE OF ILLINOIS )

) ss.:

4 COUNTY OF COOK )

5 I, RACHEL F. GARD, CSR, RPR, CLR, CRR,  
6 within and for the State of Illinois do hereby  
7 certify:

8 That DILLON HOPPER, the witness whose  
9 deposition is hereinbefore set forth, was  
10 duly sworn by me and that such deposition  
11 is a true record of the testimony given by  
12 such witness.

13 I further certify that I am not  
14 related to any of the parties to this  
15 action by blood or marriage; and that I am  
16 in no way interested in the outcome of this  
17 matter.

18 IN WITNESS WHEREOF, I have hereunto  
19 set my hand this 19th day of August, 2019.

20 *Rachel F. Gard*  
21 \_\_\_\_\_

22 RACHEL F. GARD, CSR, RPR, CLR, CRR